

REMARKS

In light of the following remarks and above amendments, reconsideration and allowance of this application are respectfully requested.

It is submitted that these claims, as originally presented, are patentably distinct over the prior art cited by the Examiner, and that these claims were in full compliance with the requirements of 35 USC §112. Changes to these claims, as presented herein, are not made for the purpose of patentability within the meaning of 35 U.S.C. §101, §102, §103, or §112. Rather, these changes are made simply for clarification and to round out the scope of protection to which Applicants are entitled.

Claims 27-29, and amended claims 1-4, 9-14, 26, 32, 34-38, 48 and 51-53 are in this application. Claims 5-8, 15-25, 30, 31, 33, 39-47, 49, 50, 54 and 55 have been canceled herein.

At pages 2-3 of the outstanding Office Action of May 22, 2003, the Examiner objected to the abstract of the disclosure because the abstract included legal phraseology such as "means." Such legal phraseology has been removed from the abstract of the disclosure. Applicants therefore respectfully request that the objection to the abstract be withdrawn.

At page 3 of the present Office Action, the Examiner objected to claims 9-14, 26, 32, 35-38, 46, 48 and 51-53 because of informalities. Claims 9-14, 26, 32, 35-38 and presumably 48 were objected to because the Examiner stated that the phrase "A imaging prevention method" should read "An imaging prevention method." These claims have been amended herein to comply with the Examiner's suggestion. Claim 46 has been canceled. Claims 51-53 were objected to because of the phrase in the preamble of the claims. The preamble of these claims has

been amended herein. Applicants therefore respectfully request that the objection to claims 9-14, 26, 32, 35-38, 48 and 51-53 be withdrawn.

At pages 3-4 of the present Office Action, the Examiner rejected claims 51 and 52 under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential structural cooperative relationships of elements, such omission amounting to a gap between the necessary structural connections. It is respectfully submitted that claims 51 and 52 have been amended herein and are not incomplete. Applicants therefore respectfully request that the 112 rejection of claims 51 and 52 be withdrawn.

At page 4 of the present Office Action, the Examiner rejected claims 51 and 52 under 35 U.S.C. § 102(b) as being anticipated by Wroblewski (U.S. Patent No. 6,018,374).

Amended independent claim 51, recites in part, "An apparatus for interfering with an unauthorized imaging device...comprising: **means for detecting said unauthorized imaging device when unauthorized copying of one or more images on said screen is being performed**..." (Underlining and Bold added for emphasis.)

It is respectfully submitted that Wroblewski does not appear to teach the above-mentioned feature of amended independent claim 51. Accordingly, amended independent claim 51 is believed to be distinguishable from Wroblewski. For similar reasons, it is also believed that amended independent claim 52 is distinguishable from Wroblewski.

Applicants therefore respectfully request the rejection of claims 51 and 52 under 35 U.S.C. §102(b) be withdrawn.

At page 5 of the present Office Action, the Examiner rejected claims 1, 9-13, 26-28, 32, 51 and 52 under 35 U.S.C. § 102(e) as being anticipated by Vlahos (U.S. Patent No. 6,454,415).

Amended independent claim 1, recites in part, “An imaging prevention method for interfering unauthorized imaging...**so as to adversely affect unauthorized copying operations being performed by said unauthorized imaging device...**” (Underlining and Bold added for emphasis.)

It is respectfully submitted that Vlahos does not appear to teach the above-mentioned feature of amended independent claim 1. Accordingly, amended independent claim 1 is believed to be distinguishable from Vlahos. For similar reasons, it is also believed that amended independent claims 9-13, 26, 32, 51 and 52 are distinguishable from Vlahos.

Further, claims 27 and 28 depend from amended independent claim 26, and due to such dependency are believed to be distinguishable over Vlahos for at least the reasons described above.

Applicants therefore respectfully request the rejection of claims 1, 9-13, 26-28, 32, 51 and 52 under 35 U.S.C. §102(c) be withdrawn.

At page 7 of the present Office Action, the Examiner stated that claims 2-4, 14, 29, 34-38, 48 and 53 are objected to as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all the limitations of the base claim and any intervening claims. Applicants submit that claims 14, 34-38, 48 and 53 were previously presented in independent form in the original application. Therefore, claims 14, 34-38, 48 and 53 are believed to be allowable. Applicants appreciate the Examiner's comments that dependent claims 2-4 and 29 would be allowable if rewritten in independent form. It is respectfully submitted that claims 2-4 and 29 have been rewritten herein in independent form. Therefore, claims 2-4 and 29 are believed to be allowable.

This is in response to the Examiner's statement of reasons for the indication of allowable subject matter, included at pages 7-8 of the present Office Action. To the extent the Examiner's statement states, implies or is construed to mean that the claims are allowable over the prior art of record because the Examiner believes the claims should be interpreted to include one or more features or limitations not recited therein, Applicants' attorney disagrees with such an interpretation. Moreover, it is Applicants' contention that there is no particular limitation in the allowed claims that is more critical than any other. The issuance of the Examiner's statement should not be construed as a surrender by Applicants of any subject matter. It is the intent of Applicants, by their attorney, to construe the allowed claims so as to cover the invention disclosed in the instant application and all equivalents to which the claimed invention is entitled.

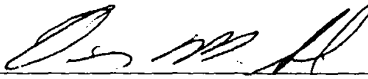
The Examiner has made of record, but not applied, a U.S. patent to Carpenter. The Applicants appreciate the Examiner's explicit finding that this reference, whether considered alone or in combination with others, does not render the claims of the present application unpatentable.

It is to be appreciated that the foregoing comments concerning the disclosures in the cited prior art represent the present opinions of the applicants undersigned attorney and, in the event, that the Examiner disagrees with any such opinions, it is requested that the Examiner indicate where in the reference or references, there is the bases for a contrary view.

Please charge any fees incurred by reason of this response and not paid herewith to
Deposit Account No. 50-0320.

Respectfully submitted,

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